

INVOICE

ANDRE ALEXANDER
56 DEN RICH ROAD
STAFFORD, VA 22554

Invoice # Draft
File Number: ALEXANDER, ANDRE / 1
Invoice Date: Fri, December 06, 2013

Re: ALEXANDER, ANDRE

Current Charges:

Fees

Date	Init.	Description	Hours	Amount
3/19/2012	JCG	Rv docs from Brynn Alexander re: odometer misrepresentation case. Give advice to legal assistant to tell PNC	0.3	117.00
4/24/2012	JCG	Rc docs from we ordered from DMV, notes to assistant what we need. Try to find James Carswell, former owner, on internet, etc.	0.6	234.00
5/14/2012	JCG	Rv docs. Call PNC for more info, notes to file	0.3	117.00
6/20/2012	JCG	Rv all docs and notes to file about what claims we have, and discuss what info Bay Auto had in file when it sold the car.	1.2	468.00
7/4/2012	JCG	Rv fee agreement, and docs to file.	0.2	78.00
7/31/2012	JCG	Rv file in prep to prepare Complaint (.5); begin prep of complaint (1.4) Email o client. Search to find James Carswell on internet, and check out his address. (.5)	2.4	936.00
8/1/2012	JCG	R/l on Mag- Moss, and Odometer Act, (1.1) rev file and client's notes, prepare detailed complaint. t/c w/ client. (3.4)	4.5	1,755.00
9/13/2012	JCG	T/c w/ client re: case and what to do. and car fax. Prepare state version of lawsuit.	1.3	507.00
10/12/2012	JCG	Call from client re: status, discuss case, and notes to file.	0.2	78.00

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12/13/2012	JCG	Rv Car Fax docs received from SDT. Email to client. (.3) Compare these docs to sale dates and identify the docs that confirm the misrepresentations by both defendants.(1.3) Prepare detailed chronology based on docs we have so far;; Call Lube Tech for copy of invoice. (2.1)	3.7	1,443.00
12/21/2012	JCG	Long conversation w/ Andre and wife re: when purchase was finalized, and attempts to compromise with dealer.	0.6	234.00
12/21/2012	JCG	Rv file and close review of the purchase docs to confirm deal not finalized until several days after 8/24/10; and close review of both arbitration agreements.	0.4	156.00
12/28/2012	JCG	Rv file and notes to pprepare Complaint.	0.7	273.00
12/31/2012	JCG	Rv file and figure out what other info I need to subpoena. (.4) Email and call clients. (.3)Prepare SDT to Citi Financial and Manheim Auction (.5)	1.2	468.00
1/9/2013	JCG	Discuss SDT w/ Manheim Representative and what we want.	0.3	117.00
1/9/2013	JCG	edit federal complaint to include info from docs from Car fax..	0.4	156.00
2/11/2013	JCG	Go over response top SDT from Citi financial bank re: Carswell; Rv complaint, we did it, and decide what to do.	0.4	156.00
2/28/2013	JCG	rv file to see status, call Citifinancial to get more info for why SDT produced no records. Get transferred to several numbers after speaking with people, gave information about SDT several times.	0.9	351.00
3/18/2013	JCG	Edit and update old Complaint done 6 months ago. (.5) Rv old titles and docs from Car Fax and Manheim auction. (.4) Figure out if we can avoid arbitration and whether to sue Bay Auto.(.6)	1.5	585.00
4/16/2013	JCG	Legal Research law on arbitration and how to get a non signatory into arbitration so .	0.9	0.00

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4/17/2013	JCG	Telephone conference with client re: status (.2), and r/l on arbitration and how to get third party in arbitration (1.5) ; and edit Complaint and r/l on inferring intent from failure to investigate (2.7)	4.4	1,716.00
5/9/2013	JCG	t/c w/ Jason A. and review car fax and complaint to see what Auto did wrong in view of the new car fax.	0.8	312.00
5/21/2013	JCG	Call from Brynne Alex. about the defendants calling her and trying to get her to settle rather than calling me. Discussed what to tell them, and discussed Auto By Choice's discussion with me about his Car Fax and how he is not liable. Rv files and Car Faxes and send to her for her review.	0.7	273.00
5/24/2013	JCG	Reviewing D's Memo in support of MTD; and r/l on whether SOL has run since discovery w/ first owner starts running of statute; necessity of privity between the parties for fraud and VCPA counts; and whether fraud must plead ID of perpetrator	3.4	1,326.00
5/29/2013	JCG	Research all issues raised by Auto By Choice's Motion To Dismiss; e.g. when does SOL accrue in a fraud case, whether the SOL in odometer fraud accrues with first violation or when plaintiff discovers it; whether lack of specificity is an issue and if Exhibit is part of pleading; requirement of direct representation from someone to be fraud vs. a remote seller.; (4.5) Redraft of Overview of case (1.5); preparing outline of D's arguments and outline of our response (.9); writing the response (6.0); discuss settlement offer with OC, notes to file (.2)	13.1	5,109.00
5/30/2013	JCG	Drafting documents - Rv rough draft of Reply Memo to Auto By Choice's MTD. Edit and rewrite portions.	5.4	2,106.00
6/11/2013	JCG	Skim the five pleadings received today, and esp. Amended MTD, r/l briefly on state law trumping federal law on pendent claims.	0.1	39.00

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6/13/2013	JCG	R/l on whether state procedural law trumps federal law in pendent jurisdiction case.	1.5	585.00
6/14/2013	JCG	R/l on ad damnum requirement under federal law. Rv criteria for granting MT Dismiss. Rv D's argument about particularity. Rv when Cure offer has to be provided by D. is a MTD a responsive pleading under VCPA?	0.8	312.00
6/18/2013	JCG	Preparing rough draft of Memorandum In Opposition to Motion To Strike from Autos By Choice	4.1	1,599.00
6/19/2013	JCG	Edit Memo in Response to Motion To Strike (1.9) and prepare Motin and Memo to amend Complaint (2.0)	3.9	1,521.00
6/20/2013	JCG	Final Edit Memorandum in Opposition To Motion To Strike	0.4	156.00
6/21/2013	JCG	Correspondence with Hunter Old re: settlement; call to client re" what engine looks like; and rv of email from Hunter O. R/l on Inferring intent from failure to investigate.	1.1	429.00
6/24/2013	JCG	R/l on Rule 12 and whether amendments allowed to a M to Dismiss, also r/l on preemption. (2.2) Outline and compare initial MTD with Amended MTD, write initial response to Autos Motion To Amend its MTD. (3.9)	6.1	2,379.00
6/25/2013	JCG	t/c w/ client re; date of discovery of the fraud; what wife knew, and rv Email from client and respond to him.	0.2	78.00
7/9/2013	JCG	Rv Order from Court dismissing all motions of the Defendant and granting leave to us to amend(.2); Rv of Amended Complaint , and realizing there was incorrect allegations and realizing the need to amend, I prepared Motion To Amend Amended Complaint(.9); Memo In Support of Motion To Amend, and Second Amended Complaint withdrawing the old allegations that were incorrect and adding the new ones. (2.4).	3.5	1,365.00
7/10/2013	JCG	Rv letter from Hunter Old re:	1.5	585.00

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		settlement. (.2); Edit Motion to Amend Amended Complaint, the accompanying memo, and edit Second Amended Complaint.		
7/11/2013	JCG	Rule 26(f) conference (.5); rv complaint and call to client re: settlement (.1) ; try to skip trace prior owner to find him to prove how mileage was disclosed (.4). t/c w' client re: new claim re: taxi driver, and private investigator (.3); t/c w' Brynn A. re: tracking down Marcus Lee and the lawsuit, and costs. Notes to file.(.3); calls to DMV investigators (.2)	1.7	663.00
7/12/2013	JCG	Respond via email to settlement offer. (.5) Notes to file. (.1) Calls to DMV Enforcement Div., call from Susanne of DMV providing info about how to get DMV's investigation results. (.4)	1.0	390.00
7/16/2013	JCG	Call from Agent Hudson and DMV, prepare SDT to go to DMV	0.3	117.00
7/29/2013	JCG	rv DMV investigation file. (.4). Rv Motion to Dismiss #2 and Memo in support. (.6);rv othe pleading s to see if I already responded to some of these issues; and r/l on ad damnum clause being required, (1.2)	2.2	858.00
7/30/2013	JCG	Rv Memo and MotionTo Dismiss Complaint No 3. Outline arguments and try to find my responses in previous briefs, cut and past those arguments; edit them, r/l on preemption(2.8); write the section on the ad damnum issue (.5); rewrite other sections on =f the brief (3.0)	6.3	2,457.00
8/21/2013	JCG	Rv Motion To Dismiss Seconf Amended Complaint field again, cmpae it and memo to original one and advise Pam to refile the original response to this Motion To Dismiss 2nd A,emded Complaint	0.2	78.00

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9/3/2013	JCG	Rv defendant's Opposition To Motion In Limine, notes to myself (.4); r/l on Mag-Moss, and right to cure, and UCC roight to cure, and admissibility of settlement offers and prepare response. (5.7)	6.1	2,379.00
9/24/2013	JCG	Rv of Complaint, DMV investigation, and misc docs, to prepare depo notice (.5); Preparation of depo notice to Autos By Choice.	1.3	507.00
10/15/2013	JCG	Rv discovery from D, prepare objections, r/l on contention interrogatories.	0.8	312.00
10/28/2013	JCG	Discuss new depo date w/ OV, due to defendant's inability to appear. Then try to find available dates and get client's agreement.	0.4	156.00
10/29/2013	JCG	Rv former Motion Get Default Judgment and begin preparing . Bay Auto case.	0.7	273.00
11/5/2013	JCG	R/l on propriety of settling with one defendant for just one type of damage, such as legal fees, and going for default judgment for other damages in view of the cap of \$25K.	1.8	702.00
11/5/2013	JCG	T/c w/ OC re" settlement offer. (.2); calls to clients and lengthy conversations (.5); Cal to OC (.1)	0.7	273.00
11/12/2013	JCG	Negotiate settlement with Hunter Old via several calls, call to Andre, and notes to file, and confirming email to client and Hunter O.	0.7	273.00
11/13/2013	JCG	Lengthy Discussion with Brynn A. the damages we should recover from the defendant, Bay Auto, and what records she has to verify mileage and rental costs. Plus providing an advance for the truck's payoff. Send confirming email,	0.7	273.00
11/15/2013	JCG	Email to Andre" regarding possibility of no emotional distress.	0.3	117.00
11/15/2013	JCG	emails to Brynn RE: receipts.	0.2	78.00
11/18/2013	JCG	Rv docs sent from Brynn and respond to her.	0.1	39.00
11/27/2013	JCG	Begin preparation of Memorandum In Support Of Motion For Default and	7.4	2,886.00

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		Damages, rv Complaint and Amended Complaint; prepare a list of damages, and decide what we can recover; calculate damages, mileage loss and recovery(1.4) ; r/l default judgment and if allegations are deemed admitted (.5); Prepare actual memo (5.5); begin prepare affidavit of Plaintiff. (.5)		
12/2/2013	JCG	Prepare Affidavit for Andre (5.5); t/c w/ Andre (.3) Edit Memorandum in support of Default judgment (.3);	6.1	2,379.00
12/4/2013	JCG	Discuss what needs to be done to get Motion For Default and memo out. Begin prep of fee affidavit, rv fee affidavits to send to Robin A.	0.5	195.00
12/4/2013	JCG	Correspond w/ Brynn re: damages	0.3	117.00
12/5/2013	JCG	Rv Andre's corrections for his affidavit (.1); incorporate those into his affidavit and continue preparing it (2.8); t/c w. Robin Abbot re: being expert for legal fees (.3); preparation of rough draft Abbot Affidavit (and r/l on recovering legal fees, to present to her (3.5); edit Memo in support of default judgment (.4)	6.9	0.00
12/6/2013	JCG	Rv email from Andre' and respond to question about what he can expect to recover . Recalculate damages. And explain about costs advanced, etc.	0.4	156.00
12/6/2013	JCG	Go through to decide what pleadings to send Robin A, and send to her..	0.4	156.00
12/6/2013	JCG	Estimated time to coordinate , gather and send in docs to court, (1.0); and close out case in court,(1.0) (assuming no hearing), and then prepare necessary docs to make claim to the Transaction Recovery Fund.(4.0)	6.0	2,340.00
Fees for Services Rendered			126.5	\$46,293.00

Expenses

Date	Description	Amount
4/19/2013	Filing Fees to Court	350.00

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4/30/2013	Service of process fees	125.00	
	Total Expenses	<u>\$475.00</u>	
	Total Fees & Expenses	<u>\$46,768.00</u>	
	Total New Charges		<u>\$46,768.00</u>

Account Statement:

Balance as of Last Invoice	0.00
Current Charges	<u>46,768.00</u>
Amount Due and Owing to Date	\$46,768.00

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